13D. Transportation

Regulations: 180 NAC 4-004, 180 NAC 13-005, 49 CFR Parts 171-178.

Criteria: *Applicants must either:*

Arrange for transportation of gauge by the manufacturer, distributor or other person specifically licensed to transport gauges by the Agency, NRC or Agreement State.

OR

Develop, implement, and maintain safety programs for off site transport of radioactive material to ensure compliance with U.S. Department of Transportation (DOT) regulations.

Some fixed gauge licensees have the manufacturer, distributor or other person specifically licensed to transport gauges by the Agency, NRC or Agreement State arrange for preparing and shipping licensed material. If licensees decide to transport their own gauges, they are responsible for compliance with DOT regulations which require, in part, specific labeling and surveying of the package before shipping. To appropriately survey the package the surveyor must use instruments that can measure radiation exposure rates around the package and detect contamination on the package. Appendix Q lists major DOT regulations and provides an example of a shipping paper. During an inspection, the Agency uses the provisions of 180 NAC 13 to examine and enforce transportation requirements applicable to gauge licensees.

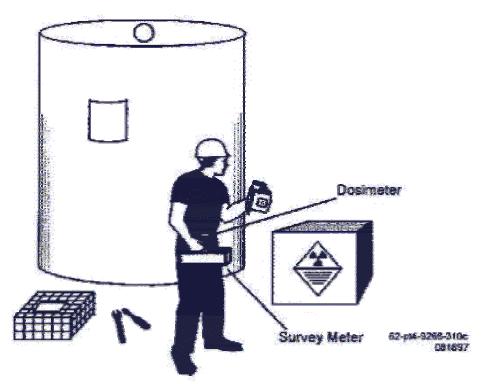


FIGURE 10 Transportation. Illustration of a fixed gauge being disassembled and packaged for transport.

Appendix R "Guide to SI Units for Radiation Protection" may be helpful to you if filling out shipping papers.

Response from Applicant: No response is needed from applicants during the licensing process; this issue will be reviewed during inspection.